

PHILLIP A. TALBERT
United States Attorney
JUSTIN L. LEE
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700

Attorneys for Plaintiff
United States of America

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN CARLOS MARTINEZ CASTRO, and
SHANNON JEFFRIES,

Defendants.

CASE NO. 2:19-CR-00233-DAD

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: December 1, 2022
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

STIPULATION

1. By previous order, this matter was set for status on December 1, 2022.
2. By this stipulation, the defendants now move to continue the status conference until January 24, 2023, and to exclude time between December 1, 2022, and January 24, 2023, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The United States tendered plea agreements to both defendants. The parties anticipate that they will update the Court regarding the resolution of the case by the date of the next status conference on January 24, 2023.
 - b) Until then, counsel for the defendants desire additional time consult with their clients, review the discovery, conduct defense investigation and research, discuss potential

1 resolution, and otherwise prepare for trial.

2 c) Counsel for the defendants believe that failure to grant the above-requested
3 continuance would deny them the reasonable time necessary for effective preparation, taking into
4 account the exercise of due diligence.

5 d) The government does not object to the continuance.

6 e) Based on the above-stated findings, the ends of justice served by continuing the
7 case as requested outweigh the interest of the public and the defendant in a trial within the
8 original date prescribed by the Speedy Trial Act.

9 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
10 et seq., within which trial must commence, the time period of December 1, 2022 to January 24,
11 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
12 T4] because it results from a continuance granted by the Court at defendant's request on the basis
13 of the Court's finding that the ends of justice served by taking such action outweigh the best
14 interest of the public and the defendant in a speedy trial.

15 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
16 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
17 must commence.

18 IT IS SO STIPULATED.

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20 Dated: November 23, 2022

PHILLIP A. TALBERT
United States Attorney

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22 /s/ JUSTIN L. LEE

JUSTIN L. LEE
Assistant United States Attorney

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24
25 Dated: November 23, 2022

/s/ HANNAH LABAREE

HANNAH LABAREE
Counsel for Defendant
JUAN CARLOS MARTINEZ CASTRO

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27
28 Dated: November 23, 2022

/s/ CHRIS COSCA

CHRIS COSCA
Counsel for Defendant
SHANNON JEFFRIES

FINDINGS AND ORDER

Pursuant to the stipulation of the parties, the status conference previously scheduled for December 1, 2022 in this case is continued to January 24, 2023 at 9:30 a.m., and time is excluded from December 1, 2022, through January 24, 2023, under Local Code T4. No further continuances of the status conference date will be granted absent a compelling showing of good cause.

IT IS SO ORDERED.

Dated: November 30, 2022

Dale A. Drozd
UNITED STATES DISTRICT JUDGE